
THE BAILYN LAW FIRM, P.C.
—Bradley R. Bailyn, Esq.—

July 4, 2022

VIA ECF

Hon. Paul G. Gardephe
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

*Re: Converged Compliance Solutions, Inc. v. XOP Networks, Inc.
et al., No. 21-CV-05482-PGG*

Dear Judge Gardephe:

I represent the plaintiff, Converged Compliance Solutions, Inc. (“CCS”), in the above-captioned matter. On March 17, 2022, pursuant to Rule IV.H of Your Honor’s Individual Rules of Practice, the defendants in this case notified this Court that more than 90 days had passed since the motion to dismiss was fully submitted on November 12, 2021. I write now to respectfully notify Your Honor that it is now more than 200 days since the motion was fully submitted.

I hope that you will pardon the additional reminder. I write because of the great urgency of the matter before you: every day that passes, the damages stemming from defendants’ piracy of CCS’ intellectual property compound, ultimately making the Court’s already complex task of restoring justice between the parties even more difficult.

We appreciate the Court’s continued attention to this matter and are available for oral argument or to answer any questions at the Court’s convenience.

Respectfully submitted,

THE BAILYN LAW FIRM, P.C.

By: /s/ Bradley R. Bailyn
Bradley R. Bailyn

cc: All Counsel of Record, via ECF